

ID Irrigation Districts

ID 01 01

In response to public request, the deadline for comments on the draft EIS was extended until April 11, 2003, providing a 90-day comment period.

ID 01 02

The deadline for comments on the DEIS was extended until April 11, 2003.

ID 02 01

Reclamation has considered your enclosures and has responded to each of the issues as they appear in your letter.

ID 02 02

Reasonable alternatives are those which allow the agency to meet its stated purpose and need. Alternatives presented in the EIS describe the potential actions that would meet the purpose and need. That there are other potential sources of water or other ways of supporting flows in the Columbia River is acknowledged, but RPA Action 31 specifically requires Reclamation to evaluate the impacts to Banks Lake of the drawdown from water surface elevation 1565 down to 1560 feet.

Reclamation used water surface elevation 1560 feet because RPA Action 31 indicated that Reclamation would evaluate a 10-foot drawdown (from full pool elevation 1570 feet).

ID 02 03

See responses to SL 03 02 and SL 03 03.

ID 02 04

See response to CO 01 01.

ID 02 05

The analysis of effects to listed endangered species is now addressed in the EIS by incorporating by reference the BiOp 2000.

ID 02 06

In correspondence from NOAA Fisheries on May 22, 2003, they indicated a possible problem related to the CRISP model data set used by the commenter. However, the incremental effects due to the Banks Lake drawdown are not appreciably different from those described in the comment.

ID 02 07

NOAA Fisheries also indicated the mid-point for passage of the listed Snake River fall Chinook at McNary Dam is August 1. Although the majority of the Hanford Reach fall Chinook population has passed, the fish for which this action is intended—the Snake River fall Chinook—are still passing the project during the August time frame.

ID 02 08

Regardless of the analysis used, individually this action has relatively minor benefits for the Snake river fall chinook. However, cumulatively, the flow augmentation impacts may result in more significant benefits.

ID 02 09

Appendix C of the EIS analyzes the probability of meeting these flow objectives, which were determined by NOAA Fisheries. Reclamation does note that the CRISP analytical model is built on a data set and relationships which influence the results of the analytical procedure. One example where this data set may be biased is the use of a 10-year average (1992 – 2002) for the survival of juvenile fall Chinook from McNary Dam to below Bonneville Dam. If the adoption of the Biological Opinion flow measures in 1995 has had a beneficial effect on survival through this reach, the use of a data set which included years prior to adoption of the BiOp flow measures would not be correctly captured by the model. However, whichever models are used, the effect of Banks Lake water on survival of outmigrating smolts is small. NOAA Fisheries seeks to obtain the finite quantity of water needed to meet its "summer flow objectives."

ID 02 10

NOAA Fisheries notes that the Northwest Power Planning and Conservation Council's recommendations regarding flows for salmon have a significant experimental component to them. The recommended changes are intended to evaluate and better define the benefits of providing flow augmentation while assessing how the provision of that water affects resident fish populations in the reservoirs from which flow augmentation volumes are provided.

ID 02 11

Some resources include an affected environment larger or smaller than other resources. The resource specialist must determine the geographic area of any change to a resource.

ID 02 12

See response to SL 03 05.

Additional information was added to the "Chapter 4, Cumulative Impacts, Anadromous Fish" section.

ID 02 13

See response to SL 03 05. In addition, it has been the policy of NOAA Fisheries not to measure incremental benefits to system survival due to relatively small changes in operations. Their opinion is that additional flow in the river directly increases the velocity in the river, which increases survival to some increment.

The increment may not be measurable but, in combination with other actions, would contribute to the recovery of the ESA listed species.

ID 02 14

Summer flow targets for the BiOp are 200,000 cfs at McNary Dam and serve as a measure of fish benefits throughout the Lower Columbia River.

ID 02 15

See response to SL 03 05.

ID 02 16

The Northwest Power Planning and Conservation Council's amendments are being analyzed for possible implementation by the affected Federal agencies.

ID 02 17

The shortest drawdown from elevation 1570 feet to 1560 feet that can be physically accomplished is a late draft starting August 12 and refilling by September 10. This scenario shuts the pumps off completely during drawdown, then refills as fast as possible. Analysis of impacts to resident fish is included in the EIS in the Fish section.

ID 02 18

BPA indicates that there would be no diminishment of peaking ability with Banks Lake drawn down 5 to 10 feet. They do not use Banks for peaking operations during August and September. Banks Lake becomes valuable for peaking operations in December through February. BPA has indicated that the power would be available.

ID 02 19

See response to CO 01 02.

ID 02 20

See response to CO 01 02. See also responses to CO 01 01, ID 02 02, and FA 01 01.

ID 02 21

See response to ID 02 07.

ID 02 22

See response to CO 02 01. Also, Reclamation acknowledges that in the event that the pumping plant were to be completely offline and unavailable as of August 31, with no prospect of returning to service before October 31 and Banks Lake were to be at elevation 1560 feet as of August 31, then Banks Lake would, in an average diversion year, experience a near-maximum draft to meet the September and October irrigation demands. Additionally, over the last 10 years, 3 years—1993, 1994 and 2001—would have exceeded the available supply from Banks

Lake in the given worst-case scenario. Additional information has been provided in chapter 3 under "Irrigated Agriculture."

ID 02 23

RPA Action 31 requested that Reclamation "assess the likely environmental effects of operating Banks Lake up to 10 feet down from full pool during August." In its 2001 Findings and Commitments Implementing December 2000 Biological Opinions for the Federal Columbia River Power System (Reclamation 2001), Reclamation concluded that RPA Action 31 was reasonable and prudent and that it was within the agency's authority to conduct the requested assessment. Reclamation also determined that, following appropriate environmental compliance actions and if determined to be warranted, it could also implement the 10-foot drawdown. The purpose and need identified in the draft EIS was to respond to RPA Action 31 and assess the impacts of providing additional summer flow augmentation in the Columbia River for listed stocks by drawing Banks Lake down an additional 5 feet in August. The commenter has indicated that Reclamation has an obligation to independently assess the RPA actions included in the BO and this NEPA process provides for the assessment of RPA Action 31. The alternative scenarios identified in the EIS are those that would allow Reclamation to meet the identified purpose and need.

ID 03 01

See responses to comment letter received from the East Columbia Basin Irrigation District (ID 02). That comment letter included the same set of enclosures.

ID 03 02

See responses to SL 03 02 and SL 03 03.

ID 03 03

See responses to SL 03 05 and SL 03 23.

ID 04 01

See response to ID 02 02.

ID 04 02

See response to CO 01 01.

ID 04 03

See response to CO 01 01.

ID 04 04

See response to ID 02 10.

ID 04 05

See response to SL 03 05.

ID 04 06

See response to ID 02 22.

ID 04 07

See response to CO 01 02.

ID 04 08

See response to CO 01 01.

ID 05 01

Comment noted.

ID 05 02

See responses to:

- 1. SL 03 05
- 2. CO 01 02
- 3. Table 4-13
- 4. ID 02 22
- 5. Comment noted
- 6. The deadline for comments on the draft EIS was extended until April 11, 2003, providing a 90-day comment period. Public hearings were held in central locations around the Columbia Basin Project. One was held in Coulee City on February 11, 2003, and one was held in Moses Lake on February 12, 2003.